

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Improving Public Safety Communications in	)	WT Docket No. 02-55
the 800 MHz Band	)	
	)	
Consolidating the 800 and 900 MHz	)	
Industrial/Land Transportation and Business	)	
Pool Channels	)	
	)	
Amendment of Part 2 of the Commission's	)	ET Docket No. 00-258
Rules To Allocate Spectrum Below 3 GHz for	)	
Mobile And Fixed Services to Support the	)	
Introduction Of New Advanced Wireless	)	
Services, Including Third Generation Wireless	)	
Systems	)	
	)	ET Docket No. 95-18
Amendment of Section 2.106 of the	)	
Commission's Rules to Allocate Spectrum at	)	
2 GHz for Use by the Mobile Satellite Service	)	

**CONSENSUS PLAN OF SPRINT NEXTEL CORPORATION,  
THE ASSOCIATION FOR MAXIMUM SERVICE TELEVISION, INC., THE  
NATIONAL ASSOCIATION OF BROADCASTERS,  
AND THE SOCIETY OF BROADCAST ENGINEERS**

**I. Introduction**

On November 6, 2007, the Commission directed interested parties to develop proposals to hasten the relocation of broadcast auxiliary service (BAS) licensees to frequencies above 2025 MHz.<sup>1</sup> In response, Sprint Nextel Corporation (Sprint Nextel), the Association for Maximum Service Television (MSTV), the National Association of

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<sup>1</sup> The Commission's 800 MHz Order directs Sprint Nextel and 2 GHz mobile satellite service licensees to relocate the BAS incumbents above 2025 MHz. See *Improving Public Safety Communications in the 800 MHz Band*, Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order, WT Docket No. 02-55, ET Docket No. 00-258, 19 FCC Rcd 14969 (2004); *Commission Seeks Comment on Ex Parte Presentations and Extends Certain Deadlines Regarding the 800 MHz Public Safety Interference Proceeding*, Public Notice, WT Docket No. 02-55, 19 FCC Rcd. 21492 (rel. Oct. 22, 2004).

Broadcasters (NAB), and the Society of Broadcast Engineers (SBE) (the “Joint Parties”) participated in a comprehensive series of discussions that culminated in a day-long conference on how to increase the pace of the BAS transition while accommodating all affected parties.<sup>2</sup> The conference included representatives from each of the Joint Parties, several independent broadcast licensees, BAS systems integrators, BAS installation firms, BAS equipment manufacturers, T-Mobile USA, Inc. (T-Mobile) and the mobile satellite service licensees TerreStar Networks Inc. (TerreStar) and ICO Global Communications Limited (ICO).<sup>3</sup>

After extensive discussion and debate, Sprint Nextel, MSTV, NAB, and SBE – in close consultation with BAS equipment manufacturers, integrators, installers, ICO, TerreStar and other interested stakeholders – developed a four-part plan that, barring unforeseen circumstances, could conclude the BAS transition by August 2009, five months earlier than previously estimated. The Joint Parties’ comprehensive BAS acceleration plan:

- establishes a comprehensive monthly market-by-market relocation schedule based in large part on the market-entry needs of the MSS licensees, T-Mobile and Sprint Nextel, which will aid all parties in planning the BAS transition and deploying new wireless services;

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<sup>2</sup> On September 4, 2007, the Joint Parties asked the Commission to waive the existing relocation completion date for an additional twenty-nine months. *See* Sprint Nextel Corporation, the Association for Maximum Service Television, Inc., the National Association of Broadcasters, and the Society of Broadcast Engineers, *Joint Petition for Waiver*, WT Docket No. 02-55, ET Docket No. 00-258, ET Docket No. 95-18 (filed Sept. 4, 2007). The Commission waived the BAS completion deadline for a limited period and subsequently ordered the Joint Parties to submit a plan by December 6, 2007 “to complete the BAS transition while allowing for the introduction of MSS in a timely manner.” *See Improving Public Safety Communications in the 800 MHz Band*, Order, ET Docket No. 95-18, 22 FCC Rcd. 17151 (2007)(“First Extension Order”); *Improving Public Safety Communications in the 800 MHz Band*, Order, WT Docket No. 02-55, ET Docket No. 00-258, ET Docket No. 95-18, 22 FCC Rcd. 19730 (2007)(“Second Extension Order”).

<sup>3</sup> For a complete list of participants, *see* Appendix A.

- adopts benchmarks to accelerate the process of negotiating BAS frequency relocation agreements and ordering new BAS equipment;
- reduces paperwork burdens associated with finalizing equipment agreements and simplifies the change order process to speed equipment to market; and
- appoints more than 200 discrete “BAS Acceleration Teams” comprised of experienced representatives from the broadcast industry and Sprint Nextel with the goal of facilitating and accelerating the nationwide BAS transition process.

Retuning roughly one-thousand BAS systems assembled link-by-link over more than thirty years has proven far more complicated and time consuming than the Joint Parties or the Commission envisioned as the Commission itself has stated.<sup>4</sup> The successful relocation of thousands of BAS transmitters and receivers will require all parties to continue finalizing deal packages, signing contracts, ordering, installing and testing equipment, and completing the BAS digital conversion. Collectively, the four-part plan that the Joint Parties and other stakeholders have developed has the potential to save substantial time over earlier projections. These measures will also help the ability of ICO, TerreStar, T-Mobile, and Sprint Nextel to meet their near- and long-term deployment needs.

Before turning to the specific elements of the Acceleration, MSTV, SBE, and NAB (the “Broadcast Parties”) note that a direct connection exists between the objectives of the BAS relocation process and the February 17, 2009 statutory deadline for completing the over-the-air digital television (DTV) transition. Many of the resources devoted to the BAS relocation process, including station engineers, tower crews, and installers, already are working at full capacity to meet the DTV transition deadline. For

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<sup>4</sup> *Second Extension Order*, 22 FCC Rcd. at ¶ 4 (“We continue to find that the issues raised by the Joint Petition are especially complex.”).

example, as the Commission is aware, there are a very limited number of qualified tower workers, so stations have made every effort to coordinate the tower work needed to meet the DTV and BAS relocation. Meeting the agreed schedules contained in this submission may necessitate additional visits by tower crews, thereby placing additional constraints on this limited service. Nonetheless, the Broadcast Parties understand the compelling need to complete this relocation and will use their best efforts to accelerate the process consistent with the timeframes outlined in this submission.

## **II. Discussion**

The Joint Parties' four-part plan to accelerate the BAS transition builds on the substantial progress that Sprint Nextel, MSTV, NAB, and SBE have made. As of December 2007, for instance, Sprint Nextel – in cooperation with BAS equipment manufacturers, system integrators, installers, contractors, and the broadcast community – has spent more than \$292 million to advance payment for an inventory of more than 18,000 items of BAS equipment, including more than 2,500 transmitters, 2,700 receivers, 5,900 controllers, 2,200 portables, 1,400 fixed links, and nearly 2,000 antennas and antenna upgrades.

With strong leadership from the primary broadcast trade associations, hundreds of BAS licensees are actively working to accelerate and complete the BAS relocation. Nearly 70 percent of BAS licensees have finalized and received approval of “quote packages” for new equipment.<sup>5</sup> More than 55 percent of the necessary frequency

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<sup>5</sup> The BAS “quote package” captures the internal and external costs associated with a broadcasters' frequency relocation agreement, including the costs of manufacturing, integrating, and installing equipment as well as internal costs for the station to manage the project and to satisfy any regulatory licensing obligations the BAS licensee may incur as a result of the transition. To accelerate processing and simplify the broadcasters' responsibilities during the BAS transition, Sprint Nextel does not require quote packages to include competitive bids from

relocation agreements are complete. In addition, BAS licensees have submitted more than 50 percent of the purchase orders to manufacturers.<sup>6</sup> Indeed, the number of quote packages that broadcasters have submitted to Sprint Nextel since the March 2007 BAS progress report has increased by 100 percent; the number of quote packages that Sprint Nextel has approved has jumped by 130 percent; and the number of frequency relocation agreements (FRAs) that the parties have signed has increased by 150 percent.<sup>7</sup>

Notwithstanding this remarkable progress, the Joint Parties consulted with all relevant stakeholders and developed plans to accelerate the BAS transition.

**A. The Market Schedule Accommodates the Spectrum Access Requirements of TerreStar, ICO, T-Mobile, and Sprint Nextel while Protecting the Interests of BAS Licensees.**

The Joint Parties reviewed the market-access needs of TerreStar, ICO, T-Mobile, and Sprint Nextel and developed a market-by-market, month-by-month schedule for BAS transitions to ensure that the BAS transition accommodates each party to the greatest extent possible.<sup>8</sup> The Commission's *Second Extension Order* directed the Joint Parties to

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multiple different manufacturers, integrators and installers unless the terms of the submission do not represent commercially reasonable charges.

<sup>6</sup> For ease of reference, these percentages and all other similar values referenced in this submission refer only to primary BAS facilities, not secondary BAS facilities, such as 720-hour rule stations and low-power television facilities, which Sprint Nextel has voluntarily agreed to relocate under certain conditions. The Joint Parties have already agreed to a schedule to provide comparable facilities for eligible secondary BAS facilities and equipment on an accelerated basis. While the relocation of qualified secondary BAS facilities increases costs, the additional activity associated with secondary relocations should not materially alter the amount of time required to complete the overall BAS relocation process.

<sup>7</sup> Specifically, the percentage of quote packages submitted to Sprint Nextel rose from 37 percent of the total stations in March to 74 percent of the total in December; the number of quote package approved by Sprint Nextel rose from 30 percent in March to 69 percent in December; and the number of FRAs signed rose from 22 percent in March to 55 percent in December.

<sup>8</sup> In 2000, the Commission directed the 2 GHz MSS licensees to clear all mobile and fixed BAS operations in the nation's top thirty DMAs and all fixed BAS operations throughout the country before the MSS licensees could commence operations. *See Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service,*

“continue consulting with other interested parties to develop a detailed plan for completing the transition of the 2 GHz BAS licensees.”<sup>9</sup> To fulfill this request, Sprint Nextel organized numerous in-person meetings and conference calls with ICO and TerreStar to assess and discuss each party’s specific market-access requirements.<sup>10</sup> Sprint Nextel also discussed the BAS transition in person and over the phone with lawyers and engineers from T-Mobile, whose adjacent-channel AWS A Block operations may cause harmful interference to, and receive harmful interference from, pre-transition analog BAS operations, according to T-Mobile.<sup>11</sup> The Broadcast Parties conducted similar discussions with the MSS licensees and T-Mobile. These discussions culminated in the widely attended face-to-face meeting on November 27, 2007 among more than fifty-five senior executives, experts and leaders from all of the major stakeholders mentioned earlier. Sprint Nextel retained a neutral, third-party management consultant and meeting facilitator to assist in organizing the November 27 meeting as a BAS Acceleration Summit and in focusing the disparate group of interested parties on how best to accelerate the transition process.

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Second Report and Order and Second Memorandum Opinion and Order, ET Docket No. 95-18, 15 FCC Rcd 12315 (2000) (*2 GHz MSS Second Report and Order*). While this obligation has applied to MSS licensees for nearly a decade, MSS licensees have not relocated BAS licensees from the band. The current relocation process offers the best approach to ensure timely and orderly clearance of the BAS operations from the 1990-2025 MHz band.

<sup>9</sup> *Second Extension Order*, 22 FCC Rcd. at ¶ 5.

<sup>10</sup> The discussions with TerreStar expanded upon the longstanding and productive series of monthly meetings between Sprint Nextel and TerreStar in which a team of engineers, lawyers and program managers assess the overall BAS transition against TerreStar’s continued progress in building and launching its MSS system and its evolving market priorities.

<sup>11</sup> Unlike MSS operations, which raise potential interference issues with the pre-transition channel assignments of BAS A1 and A2, T-Mobile’s AWS operations raise potential interference issues with the *post-transition* channel assignments of BAS A6 and A7. The Broadcast Parties and T-Mobile continue to investigate the reasons why and how harmful interference may occur between AWS systems and the digital BAS systems that broadcasters have selected to replace their analog BAS systems.

At the BAS Acceleration Summit, the MSS licensees TerreStar and ICO established three priorities for BAS band clearing.<sup>12</sup> First, the MSS licensees proposed providing notice of MSS satellite launches and coordinating in-orbit testing with local BAS licensees. Specifically, ICO stated its need to conduct calibration testing for its MSS satellite spot beams using beacons from calibration Earth stations to its geostationary MSS satellite. The terrestrial beacons will originate from four locations, which partially overlap with the market-access requirements needed to provide service to end users: Las Vegas, Nevada; South Easton, Massachusetts; Brewster, Washington; and Ellenwood, Georgia. According to ICO, the calibration signals need to operate continuously beginning shortly after the launch of ICO's satellite, which is currently scheduled for April, 2008. Broadcasters are currently examining the interference impact of these operations.

Second, the MSS licensees identified areas around Las Vegas, Nevada; Salt Lake City, Utah; Raleigh, North Carolina; Washington, DC; and Houston, Texas as especially high priorities. The MSS licensees asked that the Joint Parties transition all BAS operations above 2025 MHz in these five cities on various dates early next year as

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<sup>12</sup> TerreStar and ICO have indicated that these priorities arise from a combination of their business needs and their FCC milestones. The FCC milestone for launching TerreStar's satellite is September 30, 2008. The FCC milestone for launching ICO's satellite is November 30, 2007, and ICO has a request pending to extend the milestone to April 15, 2008.

	Cluster	Composite DMAs	MSS Request
<b>ICO</b>	Las Vegas, NV	Las Vegas, NV	April 2008
	Raleigh, NC	Charlotte, NC	July 2008
		Raleigh-Durham, NC	
		Greensboro-High Point-Winston-Salem, NC	
		Columbia, SC	
		Charleston, SC	
		Greenville-North Bern-Washington, SC	
		Florence-Myrtle Beach, SC	
		Wilmington, SC	
<b>TerreStar</b>	Salt Lake City, UT	Salt Lake City, UT	July 2008
	Washington, DC	Washington, DC	July 2008
		Baltimore, MD	
		Norfolk-Portsmouth-Newport News, VA	
		Richmond-Petersburg, VA	
		Salisbury, MD	
		Harrisonburg, VA	
		Charlottesville, VA	
	Houston, TX	Houston, TX	July 2008
		San Antonio, TX	
		Austin, TX	
		Harlingen-Brownsville, TX	
		Corpus Christi, TX	
		Beaumont-Port Arthur, TX	
		Lake Charles, TX	
		Laredo, TX	
		Victoria, TX	

indicated in the chart above, but in no case later than July 2008. Third, both ICO and TerreStar indicated that they desire unfettered access to all MSS frequencies that



incumbent BAS A1 and A2 systems currently occupy in the 2000-2020 MHz band by no later than January 1, 2009. TerreStar provided the Joint Parties with the executive summary of a technical study addressing the potential for interference between its MSS system and BAS, and ICO offered to prepare a similar study for its MSS system; however, Terrestrial has not yet provided the full technical study, and ICO has not produced engineering data regarding its proposed system. The Broadcast Parties remain concerned that allowing MSS licensees unfettered, pre-transition access to the 1990-2025 MHz band would cause harmful interference to BAS operations.

T-Mobile also identified its priorities for the BAS transition. T-Mobile is a licensee of A Block spectrum in the Advanced Wireless Service (AWS), which is located immediately above BAS Channel A7. T-Mobile will not physically occupy the frequencies that BAS licensees must vacate; however, T-Mobile claims that its planned AWS operations, which begin at 2110 MHz, have a greater likelihood of causing harmful interference to analog BAS operations on Channels A7 and possibly A6 than they do to digital BAS operations on those same channels. Thus, T-Mobile wants markets transitioned to digital BAS operation as quickly as possible, and T-Mobile and the Broadcast Parties are examining these interference issues.

For its part, Sprint Nextel has a strong incentive to relocate BAS licensees across the country because completing the BAS transition will permit it to initiate commercial wireless services in the 1990-1995 MHz “G Block” channel, which was assigned to

Sprint Nextel as part of the *800 MHz Order*.<sup>13</sup> Sprint Nextel has prioritized access to many of the same markets that the MSS licensees seek to serve beginning in 2009.

The Broadcast Parties have an equally strong incentive to accelerate this process. News coverage in the digital age demands that ENG operations switch to digital operations. Moreover, given the importance of local news operations, especially during emergencies, local stations and their viewers cannot risk the potential for interference caused by MSS systems operating on BAS Channels A1 and A2.

Based on the cumulative input from the stakeholders with market-access needs, Sprint Nextel conducted a comprehensive assessment of the nationwide progress in the BAS relocation. Sprint Nextel's assessment accounted for many factors involved in the BAS relocation process, including the progress local broadcasters have made in specific markets; the progress of surrounding Nielsen designated market areas (DMAs) that are located in the same or nearby clusters with the identified DMA; regional synergies from having teams already "on the ground" in nearby areas; restrictions on BAS equipment configuration and installation due to weather conditions in certain climate zones; installation constraints during broadcast sweeps months, which establish ratings and help determine advertising revenue for television station programs; and the fulfillment and installation capabilities of specific BAS manufacturers, integrators, and installers.

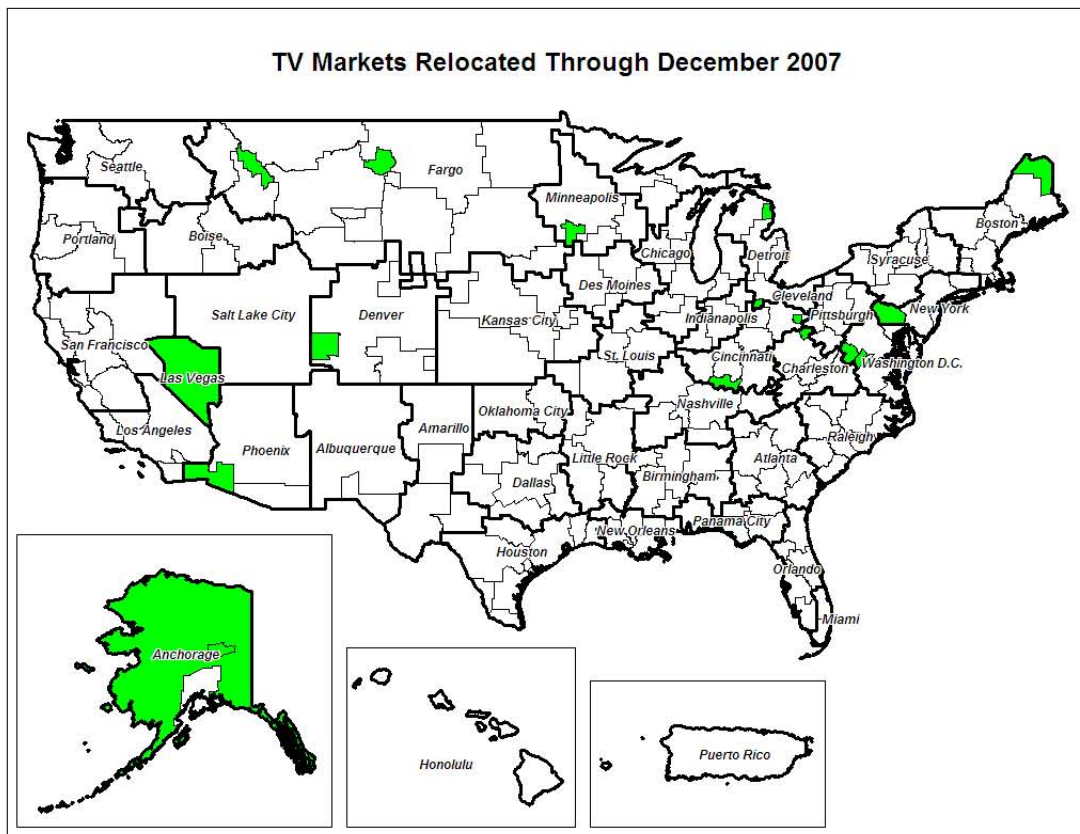
The Joint Parties' BAS relocation schedule attached as Appendix B accommodates nearly all of the MSS stakeholders' highest priority market-access needs

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<sup>13</sup> *800 MHz Order*, 19 FCC Rcd. at ¶ 222 (providing Sprint Nextel "timely and certain access to 1.9 GHz spectrum rights in exchange for vacating certain 800 MHz spectrum and assuming the cost of 800 MHz band reconfiguration").

as well as many of T-Mobile's market-clearing objectives.<sup>14</sup> The comprehensive schedule identifies each of the DMAs for which transition is not yet complete and targets a specific month by which cut-over to the new, all-digital BAS band plan should occur. The maps below provide a visual summary of the month-by-month completion dates tentatively assigned to each DMA.

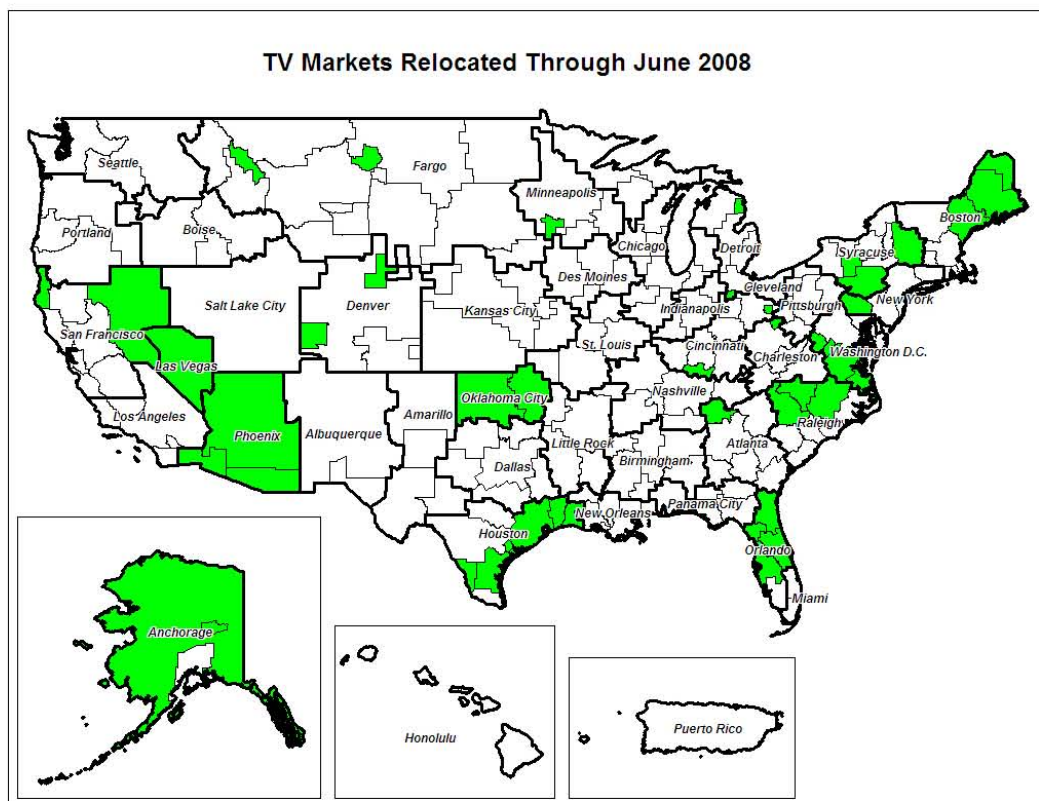
As of the end of December 2007, twenty-eight stations in seventeen markets across the country should complete transition. The markets scheduled for transition by year end include cities such as Las Vegas, Nevada; Harrisburg, Pennsylvania; and



<sup>14</sup> T-Mobile has indicated that simply converting BAS Channel A7 to digital operation will materially improve the prospective interference environment for AWS and BAS operations. To support T-Mobile's interference-resolution efforts, Sprint Nextel has provided contact information for the BAS A7 licensees in several markets that T-Mobile identified as priorities, including New York, New York and San Francisco, California.

Charlottesville, Virginia that represent seventeen percent of the nation's land area and two percent of its population. Simultaneously, the major BAS equipment manufacturers will provide the Joint Parties with a forward-looking information about their staging and fulfillment schedules. This information will allow parties to better anticipate the availability of equipment nationwide and plan accordingly in conjunction with the detail market relocation schedule in Appendix B.

By June 2008, forty-five markets should complete the BAS transition process, including each of the five key market areas that ICO and TerreStar have identified as high priorities – Las Vegas, Nevada; Salt Lake City, Utah; Raleigh, North Carolina; Houston, Texas; and Washington, DC. In addition, the BAS transition should be



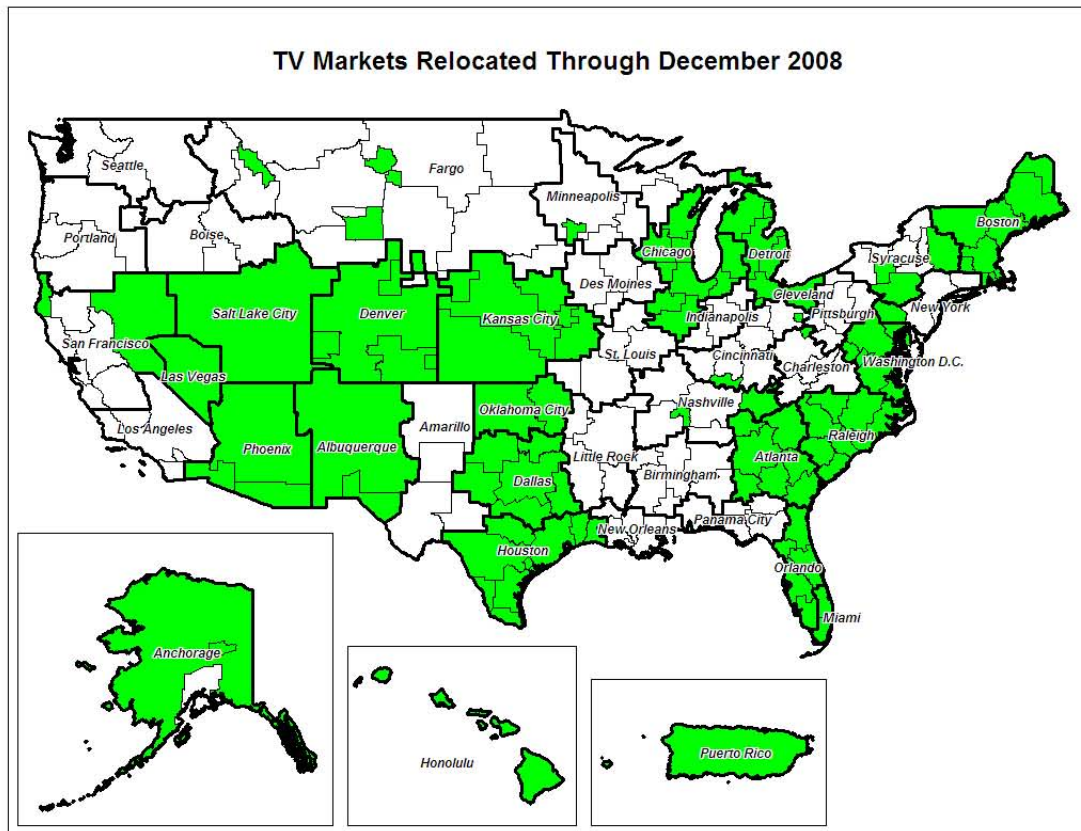
complete in Tampa Bay, Florida, which is one of the two markets that T-Mobile identified as a top priority. All told, more than 175 stations should complete the BAS

transition by June 2008. As indicated graphically below, these stations' DMAs cover 28 percent of the nation's geographic territory and 16 percent of the total United States population

By year end 2008, the steadily increasing pace of BAS activities will offer the new entrants a large and populous area across which to commence operations. If the schedule is successfully implemented, more than 500 BAS licensees in 105 DMAs should complete transition by the end of December 2008. The BAS licensees slated for relocation by that time will cover 55 percent of the nation's territory and 50 percent of the population – a sizeable market for new-to-market MSS and AWS services that will only have begun to commence operations. As shown below, the schedule will allow market access to much of the eastern seaboard, most of New England, vast areas of the southwestern United States, the entire Florida peninsula, much of Texas, and large portions of the Great Lakes region by December 2008. The transitioned areas will include several of the markets in which ICO intends to support spot-beam calibration, including South Eaton, Massachusetts and Ellenwood, Georgia.

The schedule will include a degree of flexibility to allow markets that have progressed more quickly than anticipated to move earlier without adverse impact to the overall transition, which may help achieve certain economies of scale, if, for instance, particular stations might simultaneously install digital television equipment or conduct other routine tower work. Building an element of flexibility into the transition schedule

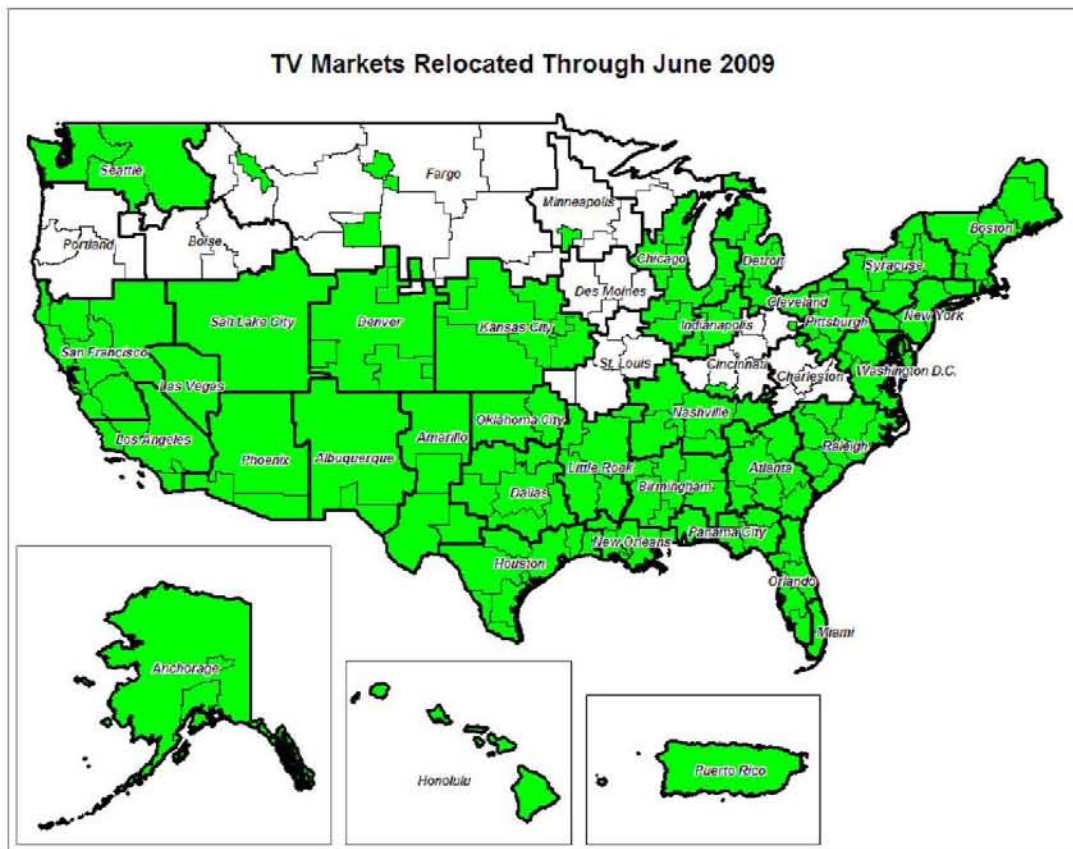
will help address some of the exigencies that may arise among particular BAS licensees due to resources needed to complete the DTV transition.<sup>15</sup>



By June of 2009, a total of 894 stations in 169 markets should complete the BAS transition. The conversion of the BAS stations to digital operation should free DMAs covering more than 75 percent of the nation's territory and 88 percent of its population for alternative wireless uses. A band of territory in the northern portion of the country will remain untransitioned by June 2009 principally due to the high likelihood of unusually hazardous weather conditions that leave limited opportunities to install equipment on the high-elevation or high-altitude BAS sites that support much of the BAS

<sup>15</sup> Depending on the market, the Broadcast Parties have indicated that it may be difficult to move forward with relocation efforts during the months of January 2009 and February 2009, which will be the critical months for the DTV transition.

equipment involved in the transition; however, these areas should complete the BAS transition two months later, in August 2009.



Of course, the Joint Parties' market-by-market transition acceleration schedule must remain somewhat tentative due to the fluid nature of a relocation process that depends on the cooperation of scores of different suppliers, integrators, contractors, programmers, installers, and consultants. At the same time, however, the detailed schedule attached as Appendix B will provide focus to relocation efforts and promote the orderly and judicious use of manufacturer, installer, broadcaster, and Sprint Nextel resources.<sup>16</sup> In addition, the master schedule should help to ensure that market clusters

<sup>16</sup> Sprint Nextel will continue to refine the schedule as it receives additional information from concerned stakeholders, including the manufacturers and installers. The vendors' capacity to supply and install equipment in each market will become more clear as broadcasters make final



relocate in a strategic and organized fashion and allow interested parties to create internal schedules and arrange the preliminary staging measures needed to ensure a smooth installation, all while allowing the MSS industry to plan its service rollout around transitioned BAS markets.

**B. Observing Various Benchmarks Will Help All Interested Parties Plan Their Deployment Schedules and Respond to the Demands of an Accelerated BAS Transition**

In a bid to further accelerate the transition, the Joint Parties have agreed to incorporate benchmarks to establish general performance expectations for all parties involved and to help prevent delays in the future. No two BAS systems are alike and each system involves custom-made hardware and software to support an internally integrated network of fixed and mobile links designed to support each broadcasters' unique needs. For every BAS licensee, the BAS relocation process involves eight stages: (1) market kickoff; (2) conducting and submitting BAS equipment inventories; (3) verifying the BAS equipment inventory; (4) submitting and approving quote packages; (5) negotiating a frequency relocation agreement; (6) submitting and fulfilling the BAS equipment order; (7) installing the BAS equipment; and (8) converting operations in a market to new digital frequencies.



As indicated in the most recent Progress Report, the BAS licensees have largely or entirely completed the first three phases of the BAS transition in most areas of the

equipment and vendor selections, complete their frequency relocation agreements, and submit purchase orders to the vendors.



country. The “BAS Accelerator Team” concept discussed below will help speed the transition process where equipment and vendor selection, quote submission, frequency relocation signing and purchase order submission is not yet complete. Moreover, the last three phases of the BAS transition process – order fulfillment, installation, and market conversion – depend on the manufacturing schedules of multiple vendors, each of which faces its own supply chain and implementation challenges and are subject to a variety of additional constraints on installation and conversion such as bad weather, zoning issues, and accessibility concerns, that are subject to unanticipated implementation delays.<sup>17</sup> Thus, the Joint Parties have focused on stages four, five, and six of the BAS transition – that is, submitting and approving quote packages, negotiating a frequency relocation agreement, and submitting the BAS equipment order – as the steps where intermediate deadlines would prove most effective in accelerating the BAS transition.

The performance benchmarks the Joint Parties have established for the key stages of the BAS transition are as follows:

Action		Timeframe
Quote Package	Broadcaster to Complete Quote Package for BAS Transition and Submit to Sprint Nextel	Not later than March 15, 2008
	Sprint Nextel Reviews Quote Package, Negotiates with Broadcasters, Obtains Additional Quotes from Manufacturers as Needed, Finalizes Document and Signs Quote Package	45 days after receipt
Frequency Relocation Agreement	Sprint Nextel Sends Initial Frequency Relocation Agreement to Broadcaster	7 days
	Broadcaster Negotiates and Signs Frequency Relocation Agreement and Sends it to Sprint Nextel	45 days

<sup>17</sup> See Sprint Nextel Corporation, *BAS Relocation Status Report*, WT Docket No. 02-55, ET Docket No. 00-258, ET Docket No. 95-18 at 13-15 (filed March 7, 2007).

Action		Timeframe
	Sprint Nextel Countersigns Frequency Relocation Agreement	7 days
BAS Equipment Order	Broadcaster Submits Purchase Order for BAS Equipment for Sprint Nextel to Immediately Forward to Manufacturers	14 days

These performance benchmarks are described in greater detail below.

***Quote Package Benchmarks.*** Once the inventory stages are complete, a BAS licensee must consult with manufacturers and other vendors regarding how best to replace the station's equipment and redesign the licensee's particular BAS system to operate on the new band plan. The BAS licensee selects the equipment, assembles the quote package to document the costs it anticipates incurring, and submits this quote package to Sprint Nextel for review and approval. Under the benchmark established here, a BAS licensee would have until March 15, 2009 to submit its quote package to Sprint Nextel. Sprint Nextel would then have forty-five days to review the Quote Package for accuracy and completeness and to ensure that its terms are commercially reasonable, obtain any additional quotes from manufacturers, negotiate any adjustments with the broadcasters, and sign the package.

***FRA Benchmark.*** The quote package forms the basis of a detailed Frequency Relocation Agreement (FRA) that establishes a legally binding contract between the BAS licensee and Sprint Nextel. Once the quote package has been approved, Sprint Nextel's regional BAS relocation team initiates FRA negotiations with each licensee. The FRA relies on the equipment inventory that Sprint Nextel and the broadcasters jointly assemble and the quotes that the broadcasters develop. The FRA also documents the cost reimbursement plan and the parties' mutual responsibilities in relocating the licensee to

comparable facilities.<sup>18</sup> Sprint Nextel spent considerable time early in the process working with MSTV, NAB, and other broadcast representatives to develop a model FRA for use as a starting point for individual licensee negotiations. Since the original negotiations commenced more than two years ago, both broadcasters and Sprint Nextel have gained considerable experience in negotiating FRAs, which allows the parties to accelerate the processing times previously associated with this stage of the BAS transition.

Under the benchmarks identified here, Sprint Nextel would send the licensee an FRA within seven days of the date that the quote package is complete. The licensee would have forty-five days within which to negotiate and sign the FRA, and then Sprint Nextel would have seven days to countersign the document. To promote a timely transition of the entire nation's BAS operations to frequencies above 2025 MHz, moreover, the Joint Parties have agreed that – absent circumstances beyond the Joint Parties' control – all FRAs should be completed no later than July 1, 2008. Taken together, these changes will save roughly three months from the date by which the Joint Parties would expect FRAs to be completed if no changes were made.

***BAS Equipment Order Benchmark.*** Upon execution of the FRA, the BAS licensee places orders for the necessary equipment and vendors install the equipment. Under the new benchmark, the station would have fourteen days following the execution of its FRA to submit its order to its manufacturers and other suppliers.

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<sup>18</sup> Sprint Nextel has an obligation to review, validate, and approve BAS inventory claims as well as to review, validate, and agree on pricing and retuning plans through well-defined FRAs. See *generally Improving Public Safety Communications in the 800 MHz Band*, Second Memorandum Opinion and Order, WT Docket 02-55, 22 FCC Rcd. 10467, ¶ 50 & n.117 (2007) (*800 MHz Second MO&O*), citing *800 MHz Order*, 19 FCC Rcd. at ¶ 330 (describing the arrangement as “in essence result[ing] in the U.S. taxpayer paying” BAS relocation-related expenses). *Id.*

In summary, while the necessary staff resources will be provided by Sprint Nextel to meet the timelines within its control, the benchmarks negotiated among the Joint Parties will establish expectations and performance goals for participants and help all interested parties plan their staffing and deployment schedules to respond to the demands of the accelerated BAS transition.

**C. The Designation of BAS Acceleration Teams Will Help Ensure that the BAS Relocation Moves as Quickly as Possible by Identifying Issues Before They Create Relocation Delays.**

To further expedite the BAS relocation effort, the Joint Parties have agreed to appoint BAS Acceleration Teams (BATs) for each DMA in the country that has not yet completed the transition. The DMA-specific BATs will be comprised of one representative each from the broadcasting industry and Sprint Nextel, each of whom must have substantial experience and knowledge of the complex, integrated network of fixed and portable links scattered among the wide variety of different types of BAS facilities that licensees have assembled, piece-by-piece, often over several decades. The relocation teams will include aggressive advocates for completing the process who are well respected within the local market and have demonstrated an interest and ability in completing relocation. The BATs will help share lessons learned from earlier transitions, improve communications among the dozens of parties involved in the transition, and short-circuit any procedural impediments to concluding the BAS transition as expeditiously as possible.

To support this effort, Sprint Nextel will provide the BATs with access to the detailed, station-by-station status information that the company has maintained since the beginning of the BAS transition. These weekly status reports, called the “Dashboard”, identify the date that each of the roughly 1000 BAS licensees met each of the eight stages

of the BAS transition. The BATs will use the specific status information provided by Sprint Nextel in three ways. First, the BATs can rely on the detailed weekly status reports to identify transition leaders that might offer support for other licensees in the DMA. Second, the BATs can use the weekly reports to identify licensees that have not progressed as quickly as other licensees in the DMA, explore the specific reasons for the delay, and propose remedies to encourage continued progress toward a timely transition. Third and finally, the BATs will be authorized to disclose status information to the Joint Parties to prevent prolonged or unwarranted delays in the BAS transition.

Sprint Nextel has already identified staff to support the acceleration teams, and the Broadcast Parties are in the process of assigning broadcasting representatives to the joint teams. In addition, MSTV and NAB have agreed to lead a public relations campaign to engage and inform smaller, non-group stations through communications with their member companies. Taken together, these actions and the high-profile roles assigned to the BAS Acceleration Teams should infuse increased attention to the BAS relocation process and help ensure that work progresses as quickly as possible by identifying problems that need to be addressed before they cause delays in ordering, integration, installation, or cutover to the new digital BAS band plan.

**D. Implementing a Revised Change-Order Process for Certain Alterations Will Save Substantial Time and Resources by Quickly Authorizing Payment Before a Formal Amendment is Executed.**

After the parties sign an FRA and begin implementation, they typically discover that minor or major changes to the system design are necessary, that a piece of equipment was missed during the inventory stage, or that the relocation must be implemented differently than initially planned. These types of omissions require the parties essentially to “restart” the inventory/quote stages and to amend the FRA. A contract amendment

provides an audit trail sufficient to ensure that the broadcaster receives the equipment required and Sprint Nextel pays only those BAS relocation expenses necessary to provide the BAS licensees with comparable facilities from funds otherwise dedicated to the United States Treasury.<sup>19</sup>

Most FRAs have required two amendments after the parties have signed the document, and even relatively commonplace missteps, such as misstating the legal name of the party signing the agreement, the Taxpayer Identification Number (TIN), or the corporate name on a bank account, can impede transition progress. As previously discussed in the Second Progress Report, Sprint Nextel has already added an entire processing team to ensure timely and accurate FRA review, approval, and execution. In addition, Sprint Nextel has implemented a “change order” process to permit broadcasters to make minor changes to the FRA without reopening the entire agreement to re-negotiation and re-execution.

To improve efficiency and save processing time associated with “change order” requests, Sprint Nextel will immediately implement internal accounting and policy changes to allow for numerous minor alterations to the terms of negotiated FRAs without requiring the parties to execute formal change orders for each alteration of the FRA. Consistent with Generally Accepted Accounting Principles (GAAP), Sprint Nextel still must preserve some control over payments to maintain the financial integrity of its payment system. While certain accounting safeguards remain necessary to properly report expenses and prevent waste, fraud, and abuse in the change-order process, Sprint Nextel will begin authorizing manufacturer and supplier reimbursement for expenses up

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<sup>19</sup> See *800 MHz Order*, 19 FCC Rcd at ¶¶ 252, 330.

to \$25,000 by email whenever the parties agree that equipment other than that specified in the FRA is required to provide the broadcaster with comparable facilities.

The prior change-order process required broadcasters and Sprint Nextel to physically execute change order documents to ensure that the manufacturers received timely payment. Under the new policy, however, Sprint Nextel will advance payment for certain equipment on an as-needed basis up to \$25,000. Sprint Nextel will then reconcile the various change orders at a later stage of the transition process through a single, master amendment to the FRA that the parties will execute. Rather than requiring the parties to execute multiple change orders for each discrete departure from the contract documents before authorizing payment to the vendors, the new process saves substantial time and resources by quickly authorizing payment first and then allowing the parties to negotiate one “clean up” change order at a later date to cover various alterations to the original agreement.

To implement the expedited expenditure of funds under the change order process, Sprint Nextel will have to make numerous adjustments to its internal electronic accounting control systems. These systems changes will ensure that the manufacturers receive payment in a timely manner, notwithstanding the discrepancy between invoices that Sprint Nextel will receive and the relocation agreements that Sprint Nextel executed. Moreover, the audit records for the relocation project will continue to depend on execution of the master change order so that Sprint Nextel and any relevant auditors can track and verify expenses. Taken together, these measures should accelerate the overall pace of the BAS transition without compromising the integrity of the reimbursement process.

### **III. Conclusion**

Sprint Nextel, MSTV, NAB, and SBE all have strong incentives to conclude the BAS transition process as quickly as possible. Assigning specific transition dates to specific markets, as the Joint Parties have agreed to do, will not only help simplify planning and supply chain management for the broadcasters, manufacturers, system integrators, and installers, but also will allow ICO, TerreStar, T-Mobile, and Sprint Nextel to better plan the construction and operation schedules for the new wireless services that they will deploy in and near the former BAS band. If implemented as planned, moreover, the Joint Parties' schedule – combined with the additional commitments to streamline and accelerate the transition process identified in this report – will substantially accommodate the needs of new entrants in the MSS, AWS, and PCS



bands. Barring unforeseen circumstances, these measures should accelerate the BAS completion process five months earlier than previous projections and allow the Joint Parties to complete the BAS transition by August 2009.

Respectfully submitted,

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NATIONAL ASSOCIATION OF  
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**Appendix A**  
**November 27, 2007 BAS Acceleration Summit Attendees**

**Broadcasting Representatives**

David Donovan (MSTV)  
Victor Tawil (MSTV)  
Larry Walke (NAB)  
Kelly Williams (NAB)  
Mike Keller (Hearst)  
Dave Siegler (Cox)  
Andy Bater (Tribune)  
Jeff Jordan (ABC) – Via Phone  
Jeff Johnson (Gannett)  
Scott Patrick (Dow, Lohnes & Albertson)  
Chris Imlay (SBE)  
Jonathan Allen (Rini Corzin) – Via Phone  
Dale Scherbring – Via Phone  
Frank Torbert – Via Phone  
LIN TV representative – Via Phone

**Mobile Satellite Service Representatives**

Doug Brandon (TerreStar)  
Sasha Field (TerreStar)  
David LaFrance (TerreStar)  
Allen Williams (TerreStar)  
Bob Keltgen (TerreStar)  
Steve Smith (TerreStar)  
David Bagley (ICO)  
Suzanne Malloy (ICO)  
Sam Wetsel (ICO)

**Manufacturers and Installer Representatives**

Rob Bauer (Broadcast Microwave Services, Inc. (BMS))  
Graham Bunney (BMS)  
Gregory Warfield (Global Microwave Systems (GMS))  
Dan McIntyre (Microwave Radio Communications (MRC))  
Eric McCulley (MRC)  
Steve DeFala (Moseley Broadcast)  
Stephen Neuberth (NSI)  
Blake Nielson (NSI)  
George Williamson (Nucomm, Inc. (Nucomm))  
Fred Fellmeth (Nucomm)  
Jeff Daubert (RF Central LLC)  
Sheldon Wigdor (Troll Systems Corporation)

Tim Carroll (DSI RF Systems, Inc. (DSI))  
Joe Giardina (DSI)  
Mike Tocco (DSI)

**Sprint Nextel Representatives**

Larry Krevor  
Mike Degitz  
Cindy Hutter Cavell  
Tim Moyer  
Robert Rufo  
Trey Hanbury  
Richard Engelman  
Mary Virginia Mangum  
Gilbert Ludwig  
David Lewis  
James Stanley  
Bob Kovacs  
Renee Callahan (Lawler, Metzger, Milkman & Keeney)

**T-Mobile Representatives**

Jonathan Shaw  
Patrick Welsh  
Dan Wilson

**Third-Party Conference Facilitators**

Greg Su  
Anurag Chandra

**Appendix B**  
**Market Relocation Schedule by Month**

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Complete	203	Fairbanks, AK	Anchorage
Complete	206	Juneau, AK	Anchorage
Complete	185	Parkersburg, WV	Charleston
Complete	182	Bowling Green, KY	Cincinnati
Complete	202	Zanesville, OH	Cincinnati
Complete	187	Grand Junction-Montrose, CO	Denver
Complete	201	Lima, OH	Detroit
Complete	208	Alpena, Mich	Detroit
Complete	207	Helena	Fargo
Complete	210	Glendive, MT	Fargo
Complete	195	Mankato,, MN	Minneapolis
Complete	174	Yuma, AZ-El Centro, CA	Phoenix

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Dec-2007	205	Presque Isle, ME	Boston
Dec-2007	53	Las Vegas, NV	Las Vegas
Dec-2007	46	Harrisburg-Lancaster-Lebanon-York, PA	New York
Dec-2007	180	Harrisonburg, VA	Washington D.C.
Dec-2007	193	Charlottesville, VA	Washington D.C.

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jan-2008		none	

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Feb-2008		none	

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Mar-2008	11	Houston	Houston
Mar-2008	128	Corpus Christi, TX	Houston
Mar-2008	137	Beaumont-Port Arthur, TX	Houston
Mar-2008	173	Lake Charles, LA	Houston
Mar-2008	191	Laredo, TX	Houston
Mar-2008	204	Victoria, TX	Houston
Mar-2008	13	Tampa-St. Petersburg(Sarasota), FL	Orlando
Mar-2008	22	Orlando-Daytona Beach-Melbourne, FL	Orlando
Mar-2008	52	Jacksonville, FL	Orlando
Mar-2008	165	Gainesville, FL	Orlando
Mar-2008	17	Phoenix, AZ	Phoenix
Mar-2008	72	Tucson (Sierra Vista), AZ	Phoenix
Mar-2008	42	Norfolk-Portsmouth-Newport News, VA	Washington D.C.
Mar-2008	60	Richmond-Petersburg, VA	Washington D.C.

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Apr-2008	84	Chattanooga, TN	Atlanta
Apr-2008	28	Charlotte, NC	Raleigh
Apr-2008	29	Raleigh-Durham(Fayetteville), NC	Raleigh
Apr-2008	47	Greensboro-High Point-Winston Salem, NC	Raleigh

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
May-2008		none	

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jun-2008	80	Portland-Auburn, ME	Boston
Jun-2008	156	Bangor, ME	Boston
Jun-2008	197	Cheyenne, WY- Scottsbluff, NE	Denver
Jun-2008	45	Oklahoma City	Oklahoma City
Jun-2008	58	Tulsa, OK	Oklahoma City
Jun-2008	111	Reno	San Francisco
Jun-2008	189	Eureka, CA	San Francisco
Jun-2008	51	Wilkes Barre-Scranton, PA	Syracuse
Jun-2008	55	Albany-Schenectady-Troy, NY	Syracuse
Jun-2008	170	Elmira, NY	Syracuse

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jul-2008	100	Savannah, GA	Atlanta
Jul-2008	115	Augusta, GA	Atlanta
Jul-2008	121	Macon, GA	Atlanta
Jul-2008	127	Columbus, GA	Atlanta
Jul-2008	37	San Antonio, TX	Houston
Jul-2008	61	Austin, TX	Houston
Jul-2008	102	Harlingen-Weslaco-Brownsville-McAllen, TX	Houston
Jul-2008	63	Knoxville, TN	Nashville
Jul-2008	184	Jackson, TN	Nashville
Jul-2008	36	Salt Lake City, UT	Salt Lake City

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Aug-2008	49	Albuquerque-Santa Fe	Albuquerque
Aug-2008	96	El Paso	Albuquerque
Aug-2008	38	Grand Rapids-Kalamazoo-Battle Creek, MI	Chicago
Aug-2008	69	Green Bay-Appleton, MI	Chicago
Aug-2008	15	Cleveland-Akron, OH	Cleveland
Aug-2008	16	Miami-Ft. Lauderdale, FL	Miami
Aug-2008	43	West Palm Beach-Ft. Pierce, FL	Miami
Aug-2008	86	Columbia, SC	Raleigh
Aug-2008	104	Charleston, SC	Raleigh
Aug-2008	106	Greenville-New Bern-Washington, NC	Raleigh
Aug-2008	116	Florence-Myrtle Beach, SC	Raleigh
Aug-2008	151	Wilmington, NC	Raleigh

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Sep-2008	10	Atlanta	Atlanta
Sep-2008	35	Greenville-Spartanburg, SC-Ashville, NC-Anderson, SC	Atlanta
Sep-2008	18	Denver	Denver
Sep-2008	93	Colorado Springs-Pueblo, CO	Denver
Sep-2008	81	Ft. Myers-Naples, FL	Orlando
Sep-2008	8	Washington, DC(Hagerstown, MD)	Washington D.C.
Sep-2008	24	Baltimore, MD	Washington D.C.

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Oct-2008	6	Boston(Manchester), MA	Boston
Oct-2008	50	Providence, RI-New Bedford, MA	Boston
Oct-2008	91	Burlington, VT- Plattsburgh, NY	Boston
Oct-2008	105	Sprigfield-Holyoke, MA	Boston
Oct-2008	3	Chicago	Chicago
Oct-2008	33	Milwakee, WI	Chicago
Oct-2008	83	Champaign & Springfield-Decatur, IL	Chicago
Oct-2008	85	Madison, WI	Chicago
Oct-2008	87	South Bend-Elkhart, IN	Chicago
Oct-2008	110	Peoria-Bloomington, IL	Chicago
Oct-2008	135	Rockford, IL	Chicago
Oct-2008	9	Detroit	Detroit
Oct-2008	64	Flint-Saginaw-Bay City, MI	Detroit
Oct-2008	67	Toledo, OH	Detroit
Oct-2008	107	Lansing, MI	Detroit
Oct-2008	120	Traverse City-Cadillac, MI	Detroit
Oct-2008	31	Kansas City, MO	Kansas City
Oct-2008	65	Wichita-Hutchinson Plus, KS	Kansas City
Oct-2008	73	Omaha	Kansas City
Oct-2008	101	Lincoln&Hastings-Kearney, NE	Kansas City
Oct-2008	138	Topeka, KS	Kansas City
Oct-2008	192	St Joseph, MO	Kansas City
Oct-2008	209	North Platte, NE	Kansas City

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Nov-2008	71	Honolulu	Honolulu
Nov-2008	211	Puerto Rico	Puerto Rico

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Dec-2008	7	Dallas-Fort Worth, TX	Dallas
Dec-2008	94	Waco-Temple-Bryan, TX	Dallas
Dec-2008	108	Tyler-Longview(Lufkin&Nacogdoches), TX	Dallas
Dec-2008	143	Wichita Falls, TX & Lawton, OK	Dallas
Dec-2008	160	Sherman, TX-Ada, OK	Dallas
Dec-2008	163	Abilene-Sweetwater, TX	Dallas



## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jan-2009	39	Birmingham, AL	Birmingham
Jan-2009	117	Montgomery, AL	Birmingham
Jan-2009	132	Columbus-Tupelo-West Point, MS	Birmingham
Jan-2009	167	Hattiesburg-Laurel, MS	Birmingham
Jan-2009	181	Greenwood-Greenville, MS	Birmingham
Jan-2009	183	Meridian, MS	Birmingham
Jan-2009	89	Jackson, MS	Birmingham
Jan-2009	30	Nashville	Nashville
Jan-2009	40	Memphis	Nashville
Jan-2009	74	Paducah, KY-Cape Girardeau, MO-Harrisburg-Mount Vernon, IL	Nashville
Jan-2009	82	Huntsville-Decatur, AL	Nashville
Jan-2009	41	New Orleans	New Orleans
Jan-2009	97	Baton Rouge	New Orleans
Jan-2009	123	Lafayette, LA	New Orleans
Jan-2009	158	Biloxi-Gulfport, MS	New Orleans
Jan-2009	177	Alexandria, LA	New Orleans
Jan-2009	62	Mobile, AL-Pensacola, FL	Panama City
Jan-2009	109	Tallahassee, FL-Thomasville, GA	Panama City
Jan-2009	149	Albany, GA	Panama City
Jan-2009	157	Panama City, FL	Panama City
Jan-2009	172	Dothan, AL	Panama City

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Feb-2009		none	

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Mar-2009	126	Amarillo, TX	Amarillo
Mar-2009	146	Lubbock, TX	Amarillo
Mar-2009	150	Odessa-Midland, TX	Amarillo
Mar-2009	196	San Angelo, TX	Amarillo
Mar-2009	57	Little Rock-Pine Bluff, AR	Little Rock
Mar-2009	75	Shreveport, LA	Little Rock
Mar-2009	118	Ft. Smith-Fayetteville- Springdale-Rogers, AR	Little Rock
Mar-2009	134	Monroe, LA-El Dorado, AR	Little Rock
Mar-2009	178	Jonesboro, AR	Little Rock
Mar-2009	2	Los Angeles, CA	Los Angeles
Mar-2009	25	San Diego, CA	Los Angeles
Mar-2009	113	Santa Barbara-Santa Maria-San Luis Obispo, CA	Los Angeles
Mar-2009	130	Bakersfield, CA	Los Angeles
Mar-2009	159	Palm Springs, CA	Los Angeles

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Apr-2009	26	Indianapolis	Indianapolis
Apr-2009	103	Ft. Wayne, IN	Indianapolis
Apr-2009	139	Terre Haute, IN	Indianapolis
Apr-2009	194	Lafayette, IN	Indianapolis
Apr-2009	5	San Francisco-Oakland-San Jose, CA	San Francisco
Apr-2009	19	Sacramento-Stockton-Modesto, CA	San Francisco
Apr-2009	54	Fresno-Visalia, CA	San Francisco
Apr-2009	112	Monterey-Salinas, CA	San Francisco
Apr-2009	131	Chico-Redding, CA	San Francisco
Apr-2009	12	Seattle-Tacoma, WA	Seattle
Apr-2009	78	Spokane, WA	Seattle
Apr-2009	124	Yakima-Pasco-Richland-Kennewick, WA	Seattle

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
May-2008		none	

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jun-2009	155	Anchorage, AK	Anchorage
Jun-2009	1	New York, NY	New York
Jun-2009	4	Philadelphia	New York
Jun-2009	27	Hartford & New Haven, CT	New York
Jun-2009	20	Pittsburgh	Pittsburgh
Jun-2009	95	Johnstown-Altoona, PA	Pittsburgh
Jun-2009	99	Youngstown, OH	Pittsburgh
Jun-2009	140	Wheeling, WV-Steubenville, OH	Pittsburgh
Jun-2009	141	Erie, PA	Pittsburgh
Jun-2009	164	Clarksburg-Weston, WV	Pittsburgh
Jun-2009	44	Buffalo, NY	Syracuse
Jun-2009	76	Syracuse, NY	Syracuse
Jun-2009	77	Rochester, NY	Syracuse
Jun-2009	154	Binghamton, NY	Syracuse
Jun-2009	168	Utica, NY	Syracuse
Jun-2009	176	Watertown, NY	Syracuse
Jun-2009	162	Salisbury, MD	Washington D.C.

## Targeted DMA Relocations by Month

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Jul-2009	125	Boise, ID	Boise
Jul-2009	166	Idaho Falls-Pocatello, ID	Boise
Jul-2009	188	Twin Falls, ID	Boise
Jul-2009	59	Charleston-Huntington	Charleston
Jul-2009	68	Roanoke-Lynchburg, VA	Charleston
Jul-2009	92	Tri-Cities, TN-VA	Charleston
Jul-2009	148	Bluefield-Beckley-Oak Hill, WV	Charleston

Relocation Month	2000 DMA Rank	DMA	DMA Cluster
Aug-2009	32	Cincinnati	Cincinnati
Aug-2009	34	Columbus, OH	Cincinnati
Aug-2009	48	Louisville, KY	Cincinnati
Aug-2009	56	Dayton, OH	Cincinnati
Aug-2009	66	Lexington, KY	Cincinnati
Aug-2009	98	Evansville, IN	Cincinnati
Aug-2009	70	Des Moines-Ames, IA	Des Moines
Aug-2009	88	Davenport, IA-Rock Island-Moline, IL	Des Moines
Aug-2009	90	Cedar Rapids-Waterloo-Iowa City & Dubuque, IA	Des Moines
Aug-2009	198	Ottumwa, IA-Kirksville, MO	Des Moines
Aug-2009	114	Sioux Falls, SD	Fargo
Aug-2009	119	Fargo-Valley City, ND	Fargo
Aug-2009	133	Duluth, MN-Superior, WI	Fargo
Aug-2009	136	Wausau-Rhineland, WI	Fargo
Aug-2009	144	Sioux City, IA	Fargo
Aug-2009	152	Minot-Bismarck-Dickinson, ND	Fargo
Aug-2009	169	Billings, MT	Fargo
Aug-2009	171	Missoula, MT	Fargo
Aug-2009	175	Rapid City, SD	Fargo
Aug-2009	179	Marquette, MI	Fargo
Aug-2009	186	Great Falls, MT	Fargo
Aug-2009	190	Butte-Bozeman, MT	Fargo
Aug-2009	199	Casper-Riverton, WY	Fargo
Aug-2009	14	Minneapolis-St. Paul, MN	Minneapolis
Aug-2009	129	La Crosse-Eau Claire, WI	Minneapolis
Aug-2009	153	Rochester, MN-Mason City, IA-Austin, MN	Minneapolis
Aug-2009	23	Portland, OR	Portland
Aug-2009	122	Eugene, OR	Portland
Aug-2009	142	Medford-Klamath Falls, OR	Portland
Aug-2009	200	Bend, OR	Portland
Aug-2009	21	St. Louis	St. Louis
Aug-2009	79	Springfield, MO	St. Louis
Aug-2009	145	Columbia-Jefferson City, MO	St. Louis
Aug-2009	147	Joplin, MO-Pittsburg, KS	St. Louis
Aug-2009	161	Quincy, IL-Hannibal, MO-Keokuk, IA	St. Louis